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MAY 31 1996

Before the
FEDERAL COMMUNICATIONS COMMISSION
Washington, DC 20554

In the Matter of	)	
	)	CS Docket No. 96-60
Leased Commercial Access	)	

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REPLY COMMENTS OF U S WEST

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May 31, 1996

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REPLY COMMENTS OF U S WEST

U S WEST, Inc. ("U S WEST") herein provides reply comments to the Federal Communications Commission's ("Commission") Further Notice of Proposed Rulemaking in the above-captioned action.[1]

I. INTRODUCTION AND SUMMARY

Several notable issues stand out from the large volume of comments submitted in this proceeding: 1) A significant amount of diverse programming, including both programming currently available on cable systems and programming in development, is threatened by the Commission's proposed changes to the leased access rate formula, e.g., C-SPAN 2, PBS Horizons, the International Channel, the Faith and Values Channel, the Golf Channel, Animal Planet, etc. This high quality, professionally produced programming which has been developed and funded assuming

[1] In the Matter of Implementation of Sections of the Cable Television Consumer Protection and Competition Act of 1992: Rate Regulation; Leased Commercial Access, MM Docket No. 92-266 and CS Docket No. 96-60, Order on Reconsideration of the First Report and Order and Further Notice of Proposed Rulemaking, FCC 96-122, rel. Mar. 29, 1996 ("FNPRM").

the existing channel availability, may not survive should current and future channel space be consumed by low-budget productions, program-length infomercials, and additional home-shopping programs; 2) The continued economic growth and viability of cable operators, especially small operators, is significantly impacted each time additional channel programming is removed from their direct control. Competitors in the video programming distribution market who do not have similar obligations will enjoy a significant regulatory-based programming advantage (in addition to the pricing and packaging freedoms they currently enjoy) over incumbent cable operators and others who are subject to the provisions of Title VI (including open video system ("OVS") providers); and 3) The Commission has thus far ignored an important group with a significant stake in the outcome of this proceeding -- cable subscribers. Cable subscribers will have to live with the results of the Commission's decision. It is extremely important that their views be represented in this matter. Continental Cablevision, Inc. ("Continental") and Tele-Communications, Inc. ("TCI") have placed the results of direct subscriber surveys on the record.[2] In its comments, U S WEST included a small portion of similar research performed by MediaOne, Inc. ("MediaOne") in Atlanta.[3] The Commission should give serious consideration in this proceeding to these surveys and the subscriber opinions that they represent.

[2] Comments of Continental, filed herein May 15, 1996 at Attachment 2; Comments of TCI, filed herein May 15, 1996 at Attachment G.

[3] Comments of U S WEST, filed herein May 15 1996 at Exhibit 1.

Several alternative rate formulas have been proposed by commenters. While U S WEST does not believe that the current leased access formula requires modification, U S WEST would support an additional review and comment cycle on the several formulas suggested. In their comments, Cox Communications, Inc. ("Cox") and Discovery Communications, Inc. ("Discovery") propose the use of the average implicit fee in place of the highest implicit fee.[4] This approach appears to be more reasonable than the cost/market formula approach proposed by the Commission. As has been demonstrated by multiple parties, the cost/market formula produces some fairly inequitable results, including the potential for a negative leased access fee.[5] These results are unacceptable and require the Commission to reexamine its original proposal.

In its review of the comments in this proceeding, the Commission should consider the full range of options proposed by commenters and evaluate the individual impacts on cable operators, programmers, and subscribers. In order to comply with the intent of Congress that commercial leased access "not adversely affect the operation, financial condition, or market development of the cable system,"[6] all costs must be considered and included for recovery in proposed rate formulas. Finally, the Commission should make minor adjustments to its current formula, if

[4] Comments of Cox, filed herein May 15, 1996 at 9-10; Comments of Discovery, filed herein May 15, 1996 at 10-12.

[5] Cox at 16; TCI at 14-16 and Attachment E; Comments of The Faith and Values Channel, filed herein May 15, 1996 at 2; Comments of Encore Media Corporation, filed herein May 17, 1996 at 3.

[6] 47 USC § 532(c)(1).

necessary, instead of making wholesale changes that produce significant economic and financial uncertainty for all parties involved.

II. COMMENTERS HAVE DEMONSTRATED THAT THE PROPOSED LEASED ACCESS FORMULA WILL SIGNIFICANTLY HARM PROGRAM DIVERSITY

Contrary to the stated goals of Congress and the Commission, commenters have shown that the Commission's proposed leased access formula modifications will significantly harm program diversity which has been developed over the past several years. By introducing additional economic and financial uncertainty for both cable operators and programmers, the Commission has in fact taken two steps backward in its goal of providing cable subscribers with a wide range of new and diverse programming.[7] Cable operators and existing programmers are consistent in their comments that the proposed changes will cause them to reconsider their current plans for adding or developing new channels.

For programmers, the Commission's leased access proposal curbs any plans that they might have had for new programming and also puts existing programming at risk. This is especially true for recently added cable programming and current programming which does not have broad viewership (including some of the more "public interest" programming currently in cable channel line-ups). New and

[7] National Cable Satellite Corporation d/b/a C-SPAN ("C-SPAN") notes that the Commission's leased access proposal is a "solution in search of a problem" as "the market has already achieved such diversity of [programming] sources as a result of vigorous competition *within* the cable industry and competition *with* the industry." Comments of C-SPAN, filed herein May 15, 1996 at 5.

existing programmers who supplied comments in this proceeding were legitimately distressed by the Commission's proposal. Viacom, Inc. ("Viacom") notes that the Commission's proposal could have a profound "effect of changing the fundamental economic model upon which the programming marketplace has developed over the years. . . [S]uch a result would have a devastating effect on existing premium and advertiser-supported program services."[8] C-SPAN predicts that "*any* lessening of the cost of [leased commercial access] LCA will mean significant loss of carriage for [C-SPAN's] networks."[9] Discovery, who produces the Discovery Channel and the Learning Channel (and is also attempting to launch a new channel -- Animal Network), concludes that the cost/market formula has the potential for "driving popular existing programming from cable channel line-ups and making it impossible for new, non-leased access programmers to build audiences."[10] And these networks, including Outdoor Life Network, Speedvision, the Golf Channel, and BET on Jazz, note that the Commission's proposed subsidy for leased access "will sound the death knell for new, quality programming networks" as a result of restricted distribution, inadequate affiliation, and diminished advertising revenues.[11]

These programmers and others will be severely impacted by any wholesale change to the current leased access rules. All of them no doubt relied -- apparently

[8] Comments of Viacom, filed herein May 15, 1996 at 2.

[9] C-SPAN at 9.

[10] Discovery at 16.

[11] Comments of Outdoor Life Network, Speedvision Network, The Golf Channel, and BET on Jazz, filed herein May 15, 1996 at 22.

in error and to their detriment -- on the Commission's existing leased access policies. The Commission must recognize that it is these programmers who represent the future of true program diversity. As subscribers' needs and wants are identified, it will be these programmers who produce high-quality programs to meet those needs, not the fringe programmers who see leased access as a potential way to get cheap distribution on cable systems. The Commission must decide, in keeping with the original intent of Congress and in the public interest, what type of program diversity it wants to encourage.

III. THE COMMISSION'S PROPOSALS WILL HAVE A DRAMATIC IMPACT ON THE CONTINUED ECONOMIC AND FINANCIAL VIABILITY OF CABLE OPERATORS AND PROGRAMMERS

The second item which is readily apparent from the comments in this proceeding is that cable operators and cable programmers will suffer economic harm should the Commission adopt its proposed leased access rate formula. This is especially true for small cable operators who are more vulnerable to competition and receive nearly all of their revenue from subscribers.[12] A loss in channel space and subscribers translates into financial uncertainty for some of these smaller operators. Even the larger multiple service operators face the potential for economic and competitive losses. In a survey commissioned for this proceeding, over 30% of Continental's subscribers polled said they would discontinue service or move to a com-

[12] See, e.g., Comments of the Plunkett Family, filed herein May 15, 1996 at 2.

petitive provider such as Direct Broadcast Satellite (or "DBS") if a substantial number of programs were replaced with leased access programming.[13]

As U S WEST noted in its comments, the Commission has failed to take into account the costs related to increased subscriber dissatisfaction.[14] These costs are real and can be estimated from the surveys put on the record by Continental and TCI. In TCI's survey, 25% of subscribers said that they would cancel service if certain programs were deleted in favor of leased access channels.[15] Even if the number were closer to 15%, a loss of subscriber revenue of this magnitude represents more than financial hardship, it would in fact be a prohibited "taking" and unconstitutional under the Fifth Amendment. Potential subscriber losses are much more damaging than any other costs associated with providing leased access. In its comments, Continental makes the point that while a leased access programmer will only be compensating the cable operator for a single channel, a subscriber who disconnects as a result of lower perceived value stops paying for all the channels on the system.[16]

In its FNPRM, the Commission acknowledged that Congress never intended for leased access to impose a financial hardship on cable operators; it was mainly interested in removing complete editorial control from cable operators and encour-

[13] Continental at 2-3.

[14] U S WEST at 4-5.

[15] TCI at 17-18.

[16] Continental at 10, 12.

aging program diversity.[17] As noted by U S WEST and other commenters, Congress expressly provided in Section 612(c)(1) of the Communications Act that the cable operator shall establish the price, terms, and conditions of commercial leased access "which are at least sufficient to assure that such use will not adversely affect the operation, financial condition, or market development of the cable system."[18] To the extent that the Commission's proposal adversely affects cable operators in any of these areas, it is unlawful. Many operators have demonstrated that the proposed cost/market formula does not recover all costs associated with leased access provisioning.[19] Several operators have demonstrated that the cost/market formula actually generates a negative leased access rate in some instances.[20] There can be little doubt that requiring cable operators to provide access to their systems without any form of compensation is unlawful.

Existing cable programmers will also be harmed should the Commission move forward with its proposed cost/market formula. A loss of channel space on cable systems translates into lower cable system access by programmers and lower overall subscriber penetration for their offerings. Many of these programmers, especially those networks which they have recently launched, have made significant financial commitments based upon the assumption of channel space availability under the existing rules. A loss of available channel space on cable systems, and

[17] FNPRM ¶ 25.

[18] 47 USC § 532(c)(1).

[19] See, e.g., Continental at 11; TCI at 12-14; Cox at 14.

[20] See, e.g., Cox at 16; TCI at 14-15.

thus license fees and subscriber-based advertising revenues, necessarily results in a loss of viable programmers. The business cases which worked under the current assumptions are not feasible given the lower subscriber penetration numbers. Program diversity is also lost. The party who suffers the most from the loss of new, high-quality programming, however, is the cable subscriber.

IV. THE COMMISSION MUST INCLUDE THE INTERESTS OF SUBSCRIBERS IN ANY DECISION MADE IN THIS PROCEEDING

It is somewhat distressing to note that the Commission did not appear to consider the impact of its proposals on one of the most important groups in this proceeding, cable subscribers. In fact, it appears that the Commission assumed that cable subscribers would like to pay for more low-budget productions, infomercials, and home shopping in monthly cable rates. It is unfortunate that subscribers were not asked or their interests represented by the Commission in this proceeding. What the Commission assumed was in the public interest may not have been quite on point.

As noted previously, Continental and TCI have placed subscriber surveys on the record that were taken to gauge the subscriber impact that the Commission's proposed leased access changes might have going-forward. These surveys are representative of cable subscribers in general and are consistent with surveys performed previously by MediaOne. The surveys show that there is a direct correlation between highly-valued programming and cable service subscription/retention. There are many subscribers, however, who consider the current programming value to be on the borderline. It would not take a significant loss in perceived value for these subscribers to cancel their subscriptions or move their subscription to a competitive service, such as Direct Broadcast Satellite. The subscriber surveys provided show exactly this result. In the Continental and TCI surveys, 25-30% of subscribers said that they would cancel or move their service if current program offerings were replaced with leased access programming. It appears from these surveys that subscribers are not indifferent to the loss of quality programming. The Commission must consider subscriber impacts in any decision it makes in this proceeding. Indeed, they represent the "public" in public interest.

V. OTHER ISSUES

A. Commercial Leased Access Was Not Meant To Be A Substitute For Low Power Station Must-Carry

Many low-power television stations have filed comments in this proceeding claiming that they have not been provided sufficient access to cable systems through must-carry and leased access. While U S WEST understands that these stations would like to have broader distribution beyond their signal area, it does not believe that commercial leased access was meant by Congress to be the vehicle for such distribution or a substitute for low-power station must-carry provisions. Again, Congress did not intend for leased access to provide a subsidy to programmers who could not otherwise afford cable system access. Low-power stations who do not meet the must-carry qualifications under the Cable Act should not be allowed to use artificially low leased access rates to circumvent the intent of Congress. The Commission must reject the appeals of low-power television stations who see commercial leased access as some sort of backdoor into the channel line-ups of cable systems.

B. Lorilei Communications, Inc.'s MediaOne Example Inappropriately Compares Primetime Leased Access Rates With Early Morning Remnant Time Rates

In its comments, Lorilei Communications, Inc. dba THE FIRM ("Lorilei") implies that MediaOne charges a rate to leased access customers which is substantially higher than a rate it charges for the same time to Access Television Network ("Access"), a remnant reseller.[21] Lorilei's implications are inaccurate and based upon an apples to oranges comparison. The $150 per half-hour rate that Lorilei cites is the primetime leased access rate for one of the larger MediaOne systems in Atlanta. The rate that it makes the comparison to is a rate for early morning access (between 12 a.m. and 8 a.m.) which is provided to a remnant reseller on a space available basis. Remnant resellers buy vacant programming space (remnants) from cable operators and resell it to advertisers or other programmers. No guarantees are made that the requested space will be available at any given time, or that the space will be available for any regular period of time. The Commission should give no regard to the misleading rate comparison for MediaOne systems provided by Lorilei.

[21] Comments of Lorilei, filed herein May 14, 1996 at II.(c).

C. U S WEST Supports Commenters Who Suggest That Repetitive Leased Access Programming Should Be Limited

In their comments, both TCI and Access raise an important point concerning the use of leased access channels for repetitive programming.[22] TCI proposes that the Commission impose a limit on leased access users so that programming may not be repeated more than twice in one week, and that at least 50 percent of the total monthly programming offered by the leased access user must be nonrepeat programming.[23] U S WEST supports these proposals. Such restrictions are extremely important if negative subscriber reaction to additional leased access programming is to be minimized. This also helps to ensure that existing high-quality programming is not bumped by 24-hour-a-day looped infomercials. Such a restriction on repetitive programming certainly conforms to the intent of Congress that commercial leased access be used to promote, not diminish, program diversity.

VI. CONCLUSION

The Commission must fully consider the impacts of its proposed leased access modifications on cable operators, programmers, and cable subscribers prior to implementing any changes to its current rules. The Commission must not cause harm to cable operators or circumvent the intent of Congress by providing below-cost leased access rates. All costs, including the impact of lost subscribers, must be

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[22] TCI at 34-35; Comments of Access, filed herein at 8.

[23] TCI at 35.

factored into the rate calculation. The Commission should avoid making sweeping changes when a more targeted approach would be equally as effective and less disruptive to cable subscribers.

Respectfully submitted,

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CERTIFICATE OF SERVICE

I, Kelseau Powe, Jr., do hereby certify that on this 31st day of May, 1996, I have caused a copy of the foregoing **REPLY COMMENTS OF U S WEST** to be served via first-class United States Mail, postage prepaid, upon the persons listed on the attached service list.

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Kelseau Powe, Jr.

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